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OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

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Januar Well

DRINKING WATER EXPOSURE CONCENTRATIONS

SUBJECT:

Drinking Water Exposure Concentrations for Proposed New Myclobutanil Uses

on Grass Grown for Seed, Grass Pastures, Rangeland, and Sod Farms

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Executive Summary

The Environmental Fate and Effects Division (EFED) has prepared a drinking water assessment for proposed new uses of the fungicide myclobutanil (Rally® 40 WSP¹) on grass grown for seed, grass pastures, rangeland, and sod farms. Myclobutanil transformation products include 1,2,4-triazole and triazole conjugates (triazole alanine and triazole acetic acid), which are common to the conazole class of compounds. Myclobutanil residues were individually evaluated in this

¹ Supplemental Labeling Rally 40WSP, EPA Reg. No. 62719-410 (Submission # 909130)

4

drinking water assessment (DWA). In addition to the proposed new uses, the currently registered maximum use rate is for turfgrass (EPA Reg. Nos. 62719-461, 42750-166, 62719-417) is also reassessed to reflect the current label rates.

The Tier 2 PRZM/EXAMS model was used to reassess the EDWCs for the current turfgrass use rates which represents the highest myclobutanil use rates, as the previous drinking water EDWCs (D289700) had been based upon higher turf application rates and used the FIRST model. The recommended EDWCs for myclobutanil for surface water are 217.8 μ g/L, 172.2 μ g/L, and 117.2 μ g/L, for acute, annual average, and long-term average, respectively. The Tier 2 acute exposure concentration (217.8 μ g/L) is less than previously determined in the Tier 1 model (333 μ g/L). The Tier 2 long term (117 μ g/L for a 30-year average) is slightly higher than chronic/cancer value estimated with the Tier 1 model (86 μ g/L) which reflects the additional fate data and increased PCA (turf plus agricultural land).

Summary of Modeling Results

A Tier 1 (FIRST) screening-level surface water DWA was conducted for the proposed new uses for parent myclobutanil, as well as for the individual triazole degradates. The estimated drinking water concentrations (EDWC) in surface water for acute and chronic/cancer exposure for the proposed new myclobutanil uses are 47 μ g/L and 17 μ g/L, respectively (**Table 1**). The peak groundwater EDWC for myclobutanil using PRZM-GW is 4.28 μ g/L, with a post-breakthrough average concentration of 0.93 μ g/L (**Table 1**).

The proposed maximum new use rate for grass grown for seed (4 applications at 0.20 lb a.i./A; total 0.80 lb a.i./A/season; minimum 14-day reapplication interval) is lower than maximum rates currently registered for other uses, including turfgrass. Higher EDWCs were previously recommended by EFED for use in human dietary exposure estimates (see **Table 2**). These EDWCs were estimated using the FIRST model and applying a PCA (percent cropped area) of 0.87 (D289700²). The highest EDWCs were based up a maximum turf rate of 0.65 lb a.i./A, 15 applications per year and 9.75 lb a.i./A/year; however, these rates are no longer on current labels (EPA Reg. No. 62719-461, 42750-166, 62719-417). The maximum single application rate for turf is 1.3 lb a.i./A with a yearly maximum of 7.84 lb a.i./A, and minimum reapplication interval of 14 days. Because of this change in application rate and the consideration of new fate data, the turf use (maximum rate) was reassessed for surface water (**Table 2**) using PRZM/EXAMS. The registrant has submitted additional environmental fate data, an aerobic aquatic metabolism study, which was incorporated into the reassessment.

² DP Barcode D289700. Nguyen, T. and Costello, K. June 9, 2003. Emergency Exemption Review: Myclobutanil on Peppers in California.

Table 1. Maximum Tier I myclobutanil EDWCs and residues of concern for drinking water assessment based on aerial application of myclobutanil for the proposed new use on grass grown for seed, grass pastures, rangeland, and sod farms.

Use	Exposure		Surface water g FIRST (µg/L)	Maximum Groundwater Acute/Chronic EDWC	
Ose	Exposure	Acute Value	Chronic/Cancer Value	Using SCI-GROW (μg/L)	
Grass Grown for Seed, Grass Pastures, Rangeland, and Sod Farms	Parent Only	46.9	17.1	1.13	
Grass Grown for Seed,	1,2,4-Triazole ^a	5.3	1.72	0.24	
Grass Pastures, Rangeland, and Sod	Triazole Acetic Acidb	9.74	3.16	0.44	
Farms	Triazole Alanine ^c	11.98	3.88	0.54	
		Maximum (Groundwater EDW	WC PRZM-GW ^d (μg/L)	
		Highest Daily Value	Simulation Average	Post-Breakthrough Average	
Grass Grown for Seed,	Parent Only	4.28	0.90	0.93	
Grass Pastures, Rangeland, and Sod	1,2,4-Triazole	3.79	2.35	2.43	
	Triazole Acetic Acid	6.97	4.32	4.47	
Farms	Triazole Alanine	8.58	5.32	5.50	

^a Using the same environmental fate values used by Maher et al. 2006. 1,2,4-Triazole application was obtained from molecular weigh conversion times myclobutanil application rate times max percent formation rate (turf = 4 applications @ (69.0/288.78) * 0.20 * 0.307)).

The Tier 1 EDWCs from previous DWAs including the use of myclobutanil at the maximum turf rate (a rate lower then the rate used in the 1,2,4-triazole assessment) and tropical fruits are summarized in (**Table 2**). The Tier 2 PRZM/EXAMS model was used to reassess the EDWCs for the current turfgrass use rates which represents the highest myclobutanil use rates, as the previous drinking water EDWCs (D289700) had been based upon higher turf application rates and used the FIRST model. The Tier 2 acute exposure concentration (217.8 μ g/L) is less than previously determined in the Tier 1 (333 μ g/L) (**Table 2**). The Tier 2 long term (117 μ g/L for a 30-year average) is slightly higher than chronic/cancer value estimated with the Tier 1 model (86 μ g/L) (**Table 2**) which reflects the additional fate data (**Table 8**) and increased PCA (turf plus agricultural land). The proposed new use was also evaluated with PRZM/EXAMS to ensure that the Tier 1 concentrations were conservative. The triazole degradation products were not reconsidered in the DWA when the maximum turf use rates were previously assessed (D289700).

The recommended EDWCs for myclobutanil are summarized in **Table 2** (in bold). For surface water, the exposure concentrations for myclobutanil are 217.8 μ g/L, 172.2 μ g/L, and 117.2 μ g/L, for acute, annual average, and long-term average, respectively. Groundwater EDWCs were lower than the surface water estimates (**Table 2**).

^b Triazole Acetic Acid = (127.10/69.0)*1,2,4-Triazole concentration.

^c Triazole Alanine = (156.15/69.0)*1,2,4-Triazole concentration.

^d Groundwater scenario with the highest EDWCs (Table 9).

Table 2. Myclobutanil EDWCs for Current Turf Use and Proposed N						
Use (DP Barcode)	Previously Determined EDWCs Maximum Surface water EDWC) (FIRST model)			Maximum Ground water Acute/Chronic EDWC (SCI-GROW model)		
	Acute Value	Chronic/C	Cancer Value	(5CI-0)	ROW model)	
Indicated as Hops (D289700) ^{1,2}	333		86	3.2		
Tropical Fruit (D336254) ³	120.1 46.3		16.3	2.83		
	Reassessed and Proposed New Use EDWCs					
	PRZM/EXAMS			PRZM-GW		
Scenario	1-year in 10-year		20 1/		Post Breakthrough	
	Acute	Annual Ave	30 Year Ave	Acute	Ave	
PA Turf ⁴ – for turfgrass	217.84	172.2	117.2	41.5	9.0	
PA Turf ⁵ – for grasses grown for seed	28.35	21.22	13.29	4.28	0.93	

Previous maximum turf application rate: 15 applications at 0.65 lb a.i./A: 14 day interval, PCA = 0.87, aerobic soil metabolism half-life - 81 days, aerobic aquatic metabolism half-life - 162 days, and $K_d - 2.39$ mL/g..

³ Application rate: 8 applications @ 0.25 lb a.i./A; 14 day interval, and fate data from Table 8

Previously, the Office of Pesticide Program's Health Effects Division (HED) conducted an aggregate human health risk assessment for 1,2,4-Triazole and its triazole conjugates³ (triazole alanine and triazole acetic acid) which are common metabolites to the class of compounds (including myclobutanil) know as the conazoles (D322215⁴). For the aggregate human health assessment EFED prepared a Tier II (PRZM/EXAMS) drinking water assessment for 1,2,4-triazole (D320682⁵). In the absence of fate studies for triazole conjugates and in the light of potential interconversion from 1,2,4-triazole to triazole conjugates, the concentrations of triazole alanine and triazole acetic acid were derived conservatively assuming 100% conversion from 1,2,4-triazole to conjugates and using molecular weight conversion from 1,2,4-triazole to triazole conjugate. Since the myclobutanil rates for these proposed new uses are less than used in the 2006 aggregate assessment (6 applications @ 1.73 lb a.i./A; total 10.38 lb a.i./A; 14-day reapplication interval; Pennsylvania Turf scenario, the EDWCs for the triazoles based on this new use are less than those previously recommended (see **Table 3**). Because the use rates

² Assessment included a revised drinking water assessment for turf (maximum use rate) using the Tier 1 drinking water model FIRST instead of the GENEEC.

⁴ Turf use 6 applications at 1.3 lb a.i./A; yearly max of 7.8 lb a.i./A/year with a 14 day reapplication interval (EPA Reg. No. 62719-417); PCA = 0.95, and fate data from Table 8.

⁵ Proposed New Use (grass grown for seed, grass pastures, rangeland, and sod farms) 4 applications at 0.20 lb a.i./A; yearly maximum 7.84 lb a.i./A/year with 14 day reapplication interval; PCA = 0.95, and fate data from Table 8.

³ PC Code: 600074 – 1,2,4-Triazole; 600011 – Triazole Alanine; 600082 – Triazole Acetic Acid

⁴ DP Barcode D322215. Michael Doherty et al., February 7, 2006. 1,2,4-Triazole, Triazole Alanine, triazole Acetic Acid: Human Health Aggregate Risk Assessment in Support of Reregistration and Registration Actions for Triazole-derivative Fungicide Compounds.

⁵ DP Barcode D320682. I. Maher et al., February 28, 2006. 1,2,4-Triazole, Triazole Alanine, Triazole Acetic Acid: Drinking Water Assessment in Support of Reregistration and Registration Actions for Triazole-derivative Fungicide Compounds

proposed for the new use are less than those previously addressed in the aggregate exposure assessment, the 1,2,4-Triazole and its triazole conjugates (triazole alanine and triazole acetic acid) EDWCs would be expected to be lower than what was previously estimated in the triazole aggregate assessment. (**Table 3**)

Table 3. Tier 2 PRZM/EXAMS Estimated Drinking Water Concentrations for 1,2,4-Triazole, Triazole Acetic Acid, and Triazole Alanine from the Triazole Aggregate Assessment (D320682)					
	Estimated Drinking Water Concentrations (µg/I				
Use ^a	Exposure	1 in 10 year annual peak	1 in 10 year annual mean	36 year annual mean	
Golf Course Turf	1,2,4-Triazole	41.0	11.0	2.69	
	Triazole Acetic Acid (TAA)	75.4	20.2	4.95	
	Triazole Alanine (TA)	92.7	24.9	6.08	

^a Golf Course Turf PA golf course turf scenario; application rate based upon 6 applications of myclobutanil @ 1.73 lb a.i./A; 10.38 lb a.i./A/yr. /1,2,4-Triazole application was obtained from molecular weigh conversion times myclobutanil application rate times max percent formation rate (turf = (69.0/288.78) * 1.73 * 0.307)

EDWCs for myclobutanil in groundwater are estimated with PRZM-GW and SCI-GROW. Until the use of PRZM-GW is fully implemented to replace SCI-GROW for modeling potential groundwater concentrations, Tier 1 estimates using both the Tier 1 SCI-GROW and the Tier 1/Tier 2 PRZM-GW models are presented here (**Table 1**). The increased estimates of the groundwater concentration between the models is in due in part because the Tier 1 PRZM-GW model considers use for multiple (30) years, whereas SCI-GROW considers only one year of applications, regardless of multiple applications year after year.

Surface and ground water monitoring programs which have included myclobutanil have also been investigated. Myclobutanil has been detected in ambient surface water and groundwater in samples collected for the USGS's National Water Quality Assessment Program (NAWQA, 2007). Detection levels in the available monitoring data are lower than the values modeled with the respective Tier 1 and 2 surface water and groundwater models.

II. PROBLEM FORMULATION

This Tier I drinking water assessment uses modeling to provide estimates of surface and ground water concentrations of potential myclobutanil residues in drinking water source water (pretreatment) that may result from the proposed new uses of myclobutanil. Available monitoring data are used to support that the modeling estimates are conservative with respect to exposure. Primary routes of transport to source water include runoff, leaching, and spray drift. The screening level estimates of the drinking water concentrations (EDWCs) for myclobutanil were obtained with the Tier I surface water (FIRST_{v.1.1.0}) and groundwater (SCI-GROW_{v.2.3} and PRZM-GW_{v.1}) models. The assessment was conducted as a national assessment using the highend exposure conditions represented by the FIRST and PRZM-GW models and the maximum

^b TAA = (127.10/69.0)*1,2,4-Triazole concentration.

 $^{^{}c}$ TA = (156.15/69.0)*1,2,4-Triazole concentration

application rates. The Tier 2 PRZM/EXAMS model was used to provide EDWCs which reflect the currently registered turfgrass use (the highest maximum) rates.

III. ANALYSIS

Use Characterization

The myclobutanil label considered in this assessment is RALLY[®] 40 WSP (EPA Reg. No. 62719-410). Myclobutanil is proposed for use on grass grown for seed, grass pastures, rangeland, and sod farms to control powdery mildew. The proposed methods of myclobutanil application are by ground and aerial foliar spray, as well as sprinkler irrigation (chemigation).

The rates proposed for this use are given in **Table 4**. The individual application rates range from 0.125 to 0.20 lb a.i./A. The number of applications range from 4 to 6, depending on the single application rate; the minimum reapplication interval ranges from 14 to 21 days. The maximum proposed seasonal application rate is of 0.80 lb a.i./A.

Table 4. Proposed new uses and use patterns of myclobutanil under Supplemental labeling, Rally 40 WSP, [EPA Reg No. 62791-410] (PC 128857 D403754)					
New Use – Crop Groups, crops	Application Method	Max # Appl. /Interval	Rate/Season Rate (lb a.i./A)		
Grass grown for seed, grass pastures, rangeland, and sod farms	Aerial, ground spray and chemigation	6 /14 to 21 days	0.125-0.20 / 0.8		

Mode of Action

Myclobutanil is a triazole fungicide in the conazole class of fungicides which is a systemic fungicide used to control powdery mildew on a number of crops. Myclobutanil appears to be a specific inhibitor of sterol 14-demethylase, which disrupts the ergosterol biosynthesis pathway which is vital to fungal cell wall formation. It is classified as a demethylation inhibitor (DMI) fungicide.

Fate and Transport Characterization

Myclobutanil environmental fate data is generally complete and is summarized below (**Tables 5** and 6. Myclobutanil is expected to dissipate through leaching, runoff, spray drift, and to a lesser extent microbial mediated degradation. It is stable to hydrolysis and to photolysis. Myclobutanil degradation is controlled by microbial-mediated transformation. Myclobutanil is moderately persistent to persistent in aerobic soils and persistent in anaerobic soils. The major degradation product observed in the aerobic soil metabolism studies was 1,2,4-triazole. Other degradation products were CO_2 , β -4-chlorophenyl- β -cyano- γ -(1H-1,2,4-triazole)-butyric acid, unknown, or non-extractable residues. The myclobutanil showed very little degradation/metabolism for the

total system (water/sediment) in the aerobic/anaerobic aquatic metabolism study with an average half-life of 630 days (extrapolated from a 105 day study).

Terrestrial field dissipation half-life values ranged from 92 to 292 days. The potential for accumulation in soil is possible due to the persistence, especially when there are multiple applications.

Parameter	Input Value and Unit	Source (Classification) ¹		
Chemical Formula: Myclobutanil: alpha-butyl-alpha (4-ch	orophenyl)-1H-1,2-triazole-1-propane-	nitrile		
Chemical Structure: Myclobutanil				
Molecular Weight	288.8 g/ mol	DP Barcode D289700		
Solubility in water (pH 7, 20°C)	142 mg/L	DP Barcode D289700		
Vapor Pressure (@ 25 °C)	<9.75 x 10 ⁻⁶ mmHg (torr)	MRID 46802501		
Henry's Constant (25 °C)	2.6 x 10 ⁻⁸ atm m ³ /mol	calculated		
161-1 Hydrolysis at pH 5,7, and 9	Stable	MRID 00141679 (a)		
161-2 Aqueous photolysis (t _{1/2})	Stable	MRID 40641501 (a), MRID 40319801 (a), MRID 40528801 (a)		
161-3 Soil Photolysis (t _{1/2})	Extrapolated to I43 days	MRIDs 164987, 164988 Acc No. 266121 (a), Rec No. 214084 (a) (D197478)		
162-1 Aerobic Soil Metabolism $(t_{1/2})^2$	198, 224 days	MRID 001416-80 (a) MRID 164561 Rec No. 265748 (a)		
162-3 Anaerobic Soil Metabolism (t _{1/2})	Assumed Stable, No appreciable degradation in 62 days	MRID 00141680 DP Barcode D289700		
162-3 Anaerobic Aquatic Metabolism (t _{1/2}) [sediment layer]	Total System Half-lives Pond: 841.8 days	MRID 47454401 (s)		
162-4 Aerobic Aquatic Metabolism (t _{1/2}) [water column]	River: 416.8 days	1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.		
164-1 Terrestrial field dissipation (t _{1/2})	92 to 292 days	MRID 164563 (a)		

¹ Classification: (a) Acceptable and (s) Supplemental

 $^{^{2}}$ (t_{1/2}) – Myclobutanil decline does not follow first-order kinetics, therefore the decay rate is not a half-life. Estimate of DT₅₀ dependent upon method used to determine value (**See Appendix 1**).

The Freundlich K_{ads} values for myclobutanil ranged from 1.46 to 9.77 mL/g (**Table 6**). The lowest non-sand value is 2.39 mL/g. The average K_{ads} and K_{oc} were 5.03 mL/g and 520.2 mL/g_{oc}, respectively. The sorption of myclobutanil is not strongly correlated ($R^2 = 0.44$) to soil organic carbon, therefore K_{ads} is used for modeling.

Table 6. Measured Freundlic class, Organic Matter (MRII	th K_{ads} and K_{oc} , and Desorption D # 00141682).	for Myclobutan	il and Soil Textural
So	rption	Soil	Properties
K _{ads} mL/g	Koc ¹ ml/g _{organic carbon}	OM%	Texture Class
2.39	936	0.44	Clay
1.46	265	0.95	Sand
7.08	595	2.05	Silty loam
9.77	581	2.9	Sandy loam
4.44	224	3.42	Clay loam
average =5.03 std = 3.42 std/ave = 0.68	average = 520.2 std = 289.41 std/ave = 0.56	-	-

 $^{^{-1}}K_{oc} = (K_d/(\%OM/1.724)) * 100$ where K_{ads} is assumed to equal to K_d and OC% = OM%/1.724 2 Regression: p = 0.22; K_{ads} vs. OC; $R^2 = 0.44$

Because $\log K_{ow}$ s for parent and degradation products are low ($\log K_{ow}$ = 2.94), myclobutanil is not expected to bioaccumulate (MRID 00162541).

Metabolites

The major degradation products of myclobutanil observed in the aerobic soil metabolism (ASM) studies were 1,2,4-triazole (maximum 18%), CO₂, a polar degradate (β-4-chlorophenyl-β-cyano- γ -(1H-1,2,4-triazole)-butyric acid; maximum 9 %), and unextractable residues. At the conclusion of the 367 day ASM study, 29 to 33 percent of the applied radioactivity remained as parent myclobutanil and 13 percent was identified as 1,2,4-triazole.

1,2,4-triazole and its conjugates are common metabolites to the class of compounds know as the conazoles. The environmental fate data for the "Residue of Concern" 1,2,4-triazole are list in **Table 7.** Detailed information concerning the environmental fate of 1,2,4-triazole can be found in 1,2,4-Triazole, Triazole Alanine, Triazole Acetic Acid: Drinking Water Assessment in Support of Reregistration and Registration Actions for Triazole-derivative Fungicide Compounds (Maher et al., 2006; D320682).

The environmental fate database for 1,2,4-triazole was generally sufficient to conduct drinking water assessment. No separate laboratory and fate studies were submitted for triazole conjugates (triazole alanine and triazole acetic acid) degradation products for myclobutanil. Hence the Tier 2 PRZM/EXAMS modeling could not be performed for triazole alanine and triazole acetic acid as degradation products of myclobutanil. Therefore, the triazole alanine and triazole acetic acid concentrations were estimated my assuming 100 % conversion of the 1,2,4-triazole and adjusting by molecular weight as described below.

Parameters	Input Value and Unit	Source of Info/Reference ⁶
1,2,4-Triazole	mpu value and em	NH N
Application Rate	0.0147 ¹ lb a.i./A per application	after Maher et al. 2006 ¹ (see discussion in Background on Aggregate Triazole Drinking Water Assessment section)
Soil Partition Coefficient $(K_f)^2$	$\begin{array}{c} 0.72 \text{ mL/g} \\ (K_{ads} \ 0.7 \text{ to } 0.8) \\ (K_{des} \ 0.8 \text{ to } 7.9) \\ \text{median } K_{oc} = 104 \text{ mL/g}_{oc} \end{array}$	MRID 40891501
Molecular Weight	69.07 g/mole	MRID 45574104
Solubility (pH 7, 20 °C)	7,000,000 mg/l	MRID 45574104
Vapor Pressure at 20 °C	1.65 x 10 ⁻³ mm Hg	MRID 45574104
Henry's Law Constant at 20 °C	1.97 x 10 ⁻¹⁰ atm·m ³ /mol	MRID 45574104
Aerobic Soil Metabolism (t _{1/2})	250 days ³ 107 days ⁴	MRIDs: 45284032, 45297203, 45284027 MRIDs: 45284032, 45284027
Aqueous Photolysis (pH 5) (t _{1/2})	stable	MRID 45284026
Hydrolysis (t _{1/2}) (pH7)	16I days	MRID 43241019
Aerobic aquatic metabolism half-life (t _{1/2})	500 days ⁵ 214 days ⁶	Assumed 2 x aerobic soil metabolism half-life input value because the compound is stable to hydrolysis and no aerobic aquatic metabolism data are available (Guidance for Selecting Input Parameters in Modeling the Environmental Fate and Transport of Pesticides; Feb 2, 2002)
	Note: For this new use only: set to 0 for stable	Note: New Use only Did not use in FIRST set to stable and entered hydrolysis half-life @ pH 7 (161 days)
Anaerobic aquatic metabolism half-life ⁷ (t _{1/2})	504 days	Assumed 2 x anaerobic soil metabolism half-life multiplied by three (t _{1/2} = 84 days, MRID 45930701) because no anaerobic aquatic metabolism data are available and the compound is stable to hydrolysis (Guidance for Selecting Input Parameters in Modeling the Environmental Fate and Transport of Pesticides; Feb 2, 2002)

^{1-1,2,4-}Triazole application rate was obtained from molecular weight conversion times myclobutanil application rate times max percent formation rate (turf = (69.0/288.78) * 1.73 lb a.i./A * 0.307; this assessment = ((69.0/288.78) * 0.20 lb a.i./A * 0.307) = 0.0147 lb a.i./A).

² – The lowest non-sand K_E value was used.

Maher et al., 2006. Memorandum: 1,2,4-Triazole, Triazole Alanine, Triazole Acetic Acid: Drinking Water Assessment in Support of Reregistration and Registration Actions for Triazole-derivative Fungicide Compounds. DP Barcode: D320682, February 28, 2006.

- Upper 90 percentile confidence bound of the mean metabolism half-life from all half-lives available (t_{1/2} (6) = 26.5; 46.7; 22.2; 343, 375; and 155 days) was used [median value = 101 days].
 Upper 90 percentile confidence bound of the mean metabolism half-life and from all but the highest
- ⁴ Upper 90 percentile confidence bound of the mean metabolism half-life and from all but the highest concentration half-lives ($t_{1/2}$ (4) = 26.5; 46.7; 22.2; and 155 days) was used [median value = 36 days].
- ⁵ Aerobic soil metabolism half-life input x 2 = 250 * 2 = 500 days
- ⁶ Aerobic soil metabolism half-life input x 2 = 107 * 2 = 214 days
- ⁷- Only one anaerobic soil metabolism half-life was available (84 days, MRID 45930701)

Drinking Water Exposure

Background on Aggregate Triazole Drinking Water Assessment

For the aggregate human health assessment a Tier 2 (PRZM/EXAMS) drinking water assessment was performed for 1,2,4-triazole and triazole conjugates, i.e., triazole alanine and triazole acetic acid derivative fungicide compounds (D320682). The modeling scenario (Maher et al., 2006, D320682) was based on the following: (1) assuming 30.7% conversion from parent myclobutanil to 1,2,4-triazole and (2) using molecular weight conversion to adjust from parent application rate to 1,2,4-triazole application rate. Based on the laboratory and field studies, triadimefon had the highest conversion percentage (30.7%) to form 1,2,4-triazole among nine triazole-forming fungicides (difenoconazole, tebuconazole, triadimefon, triadimenol, propiconazole, myclobutanil, prothioconazole, fenbuconazole, and tetraconazole). For modeling, myclobutanil was chosen because it has the highest annual application rates for non-agricultural (turfgrass) and agricultural crop (apples) uses of all conazole fungicides. The aggregate assessment was based upon myclobutanil using a maximum application rate of 1.73 lb a.i./acre applied six times per season in 14 day intervals (Note: this is a higher rate than used for myclobutanil in this assessment). This aggregate triazole assessment may require revision if any future uses are for sites not already addressed by the current list of registered or proposed uses, if the application rates of the fungicides exceed 10.38 lb a.i./acre annually for non-agricultural uses and 2.0 lb a.i./acre annually for agricultural uses, or if the formation of the metabolites exceeds 30.7%.

Modeling Exposure for Proposed Uses of Myclobutanil and its Triazole Conjugates

Tier 1 EDWCs were obtained for parent myclobutanil and 1,2,4-triazole and triazole conjugates for surface water and groundwater for the proposed new use. The maximum application rate on grass grown for seed, grass pastures, rangeland, and sod farms is 0.20 lb a.i./A applied with a season maximum of 0.8 lb a.i./A and a 14 day reapplication interval. In the absence of fate studies for triazole conjugates and in the light of 1,2,4-triazole interconversion to triazole conjugates, the concentrations of triazole alanine and triazole acetic acid were derived assuming 100% conversion from 1,2,4-triazole to conjugates and using molecular weight conversion from 1,2,4-triazole to triazole conjugate. The assessment for the new use also used the fate properties used by Maher et al. (2006), but application rate inputs were based on the proposed new use rates.

Modeling

EFED Tier I models⁷ were used to estimate the drinking water exposure for use in the dietary risk assessment of myclobutanil. The following is a description of the models used, the selection of the model input parameters, and a characterization of the output from these simulations.

Surface Water: The FIRST⁸ (FQPA Index Reservoir Screening Tool, Version 1.1.0) model was used to assess potential for contamination of surface drinking water sources by myclobutanil and 1,2,4-Triazole from the proposed new use. The Tier 2 PRZM/EXAMS⁹ model was previously used for the 1,2,4-Triazole aggregate exposure assessment (Maher et al.2006, D320682). Myclobutanil concentrations were also reassessed at the current labeled maximum rate for turf (1.3 lb a.i./A, 6 applications per year, and maximum rate of 7.8 lb a.i./A/year) with PRZM/EXAMS, updated from when turfgrass was previously assessed with a higher maximum rate for the turf use was 0.65 lb a.i./A with 15 applications per year, and 9.75 lb a.i./A/year, and a PCA of 0.87 (D289700¹⁰).

Groundwater: Myclobutanil concentrations in groundwater were estimated by the Screening Concentration in Groundwater (SCI-GROW¹¹ v2.3, Jul. 29, 2003) model. The output of SCI-GROW represents the concentrations myclobutanil residues that might be expected in shallow unconfined aquifers under sandy soils. However, SCI-GROW does not consider multiple years of application pesticide application and does not estimate a peak concentration.

For groundwater assessments, EFED is using both the SCI-GROW model and PRZM-GW. PRZM-GW can be used for Tier 1 and 2 assessments and additional refinements, provided data are available. Multiple scenarios (like surface water) can also be considered. PRZM-GW also allows for modeling multiple years of application. For groundwater exposure modeling, drinking water from a rural drinking water well located beneath an agricultural field (a high pesticide use area) drawing from an unconfined, high water-table aquifer, (*i.e.*, the PRZM-GW conceptual model representing a private well) would typically not undergo a chlorination water treatment process. PRZM-GW does not consider dilution within the aquifer and or degradation process other than aerobic soil metabolism in the upper meter of the soil, unless data are available for other processes with the vadose zone or within the aquifer.

11

⁷ http://www.epa.gov/oppefed1/models/water/

⁸ http://www.epa.gov/oppefed1/models/water/#first

⁹ http://www.epa.gov/opp00001/science/models_pg.htm

¹⁰ DP Barcode D289700. Nguyen, T. and Costello, K. June 9, 2003. Emergency Exemption Review: Myclobutanil on Peppers in California.

¹¹http://www.epa.gov/oppefed1/models/water/#scigrow

Input Parameters

Model input parameters were estimated from the fate and transport properties given **Tables 5** and 6 and the other default values are selected as recommended by EFED Input Guidance document (USEPA, 2009). Pesticide usage information was obtained from the draft labels. The inputs values used in FIRST, PRZM/EXAMS, SCI-GROW, and PRZM-GW models are summarized in **Table 8**.

In the DWA for Tropical Fruit (D336254) the aerobic aquatic metabolism half-life was assumed to be twice that of the aerobic soil metabolism half-life ($t_{1/2}$ = 502 days) (**Table 8**). However since the last assessment (D336254) an aerobic/anaerobic aquatic metabolism study was submitted (MRID 47454401). Myclobutanil showed very little degradation/metabolism for the total system (water/sediment), as less than 1% 14 CO₂ was produced during the study. The 90 percent upper bound on the mean aerobic aquatic metabolism half-life was 1283 days. The degradation products 1,2,4-triazole and its triazole conjugates were not observed in the aerobic/anaerobic aquatic metabolism study.

Table 8. Input parameters for the Tier I FIRST ¹ , SCI-GROW ¹ and PRZM-GW models used in Parent Myclobutanil Drinking Water Assessment.				
Input	Value	Rationale		
Application rate/number/interval	0.20 lb a.i.A ⁻¹ /4/14 days	Maximum proposed label use		
Incorporation depth	0	USEPA, 2009		
Hydrolysis	0 (stable)	USEPA, 2009		
Aquatic Photodegradation	0 (stable)	USEPA, 2009		
Solubility	142.0 mg/L	USEPA, 2009		
Aerobic Soil Metabolism (t _{1/2}) Myclobutanil	251 days	= Upper 90 th bound on mean		
	Assumed to be stable based upon aerobic/anaerobic	= Assumed to be stable USEPA, 2009		
	metabolism study	for FIRST Model		
Aerobic Aquatic Metabolism (t _{1/2}) Myclobutanil	1283.48 ² days	Not used in PRZM-GW Upper 90 th bound on mean of PRZM/EXAMS for turf assessment EFED Guidance (USEPA, 2009) (MRID 47454401)		
Anaerobic Aquatic Metabolism (t _{1/2})	0 Stable	= Assumed stable to be conservative		
Mobility (Freundlich K _{ads}) Myclobutanil	5.03 mL/g	For FIRST Model = Average K _d For PRZM-GW =Average K _d		
Mobility (K _{oc}) Myclobutanil	224 mL/g _{oc}	For SCI-GROW ³ = Lowest Koc		
Aerial Spray Drift	0.16 (fraction)	USEPA, 2009 (FIRST)		
Wetted In	No	Label		

Table 8. Input parameters for the Tier I FIRST ¹ , SCI-GROW ¹ and PRZM-GW models used in Parent Myclobutanil Drinking Water Assessment.					
Input Value Rationale					
PCA (Percent Crop Area)	0.95 (fraction)	USEPA, 2012			

In the 2003 DWA¹² the aerobic soil metabolism half-life was 81 days, the aerobic aquatic metabolism half-life was 162 days, and the PCA was 0.87.

Modeling Results

The drinking water exposure concentrations for myclobutanil for the proposed uses on grass grown for seed, grass pastures, rangeland, and sod farms at the maximum use rate (4 applications at 0.20 lb a.i/A, 14 day reapplication interval) produced lower EDWCs (**Table 9**) than the previously assessed turf scenario (Table 3). For parent myclobutanil, the EDWCs (surface water peak = $46.9 \mu g/L$, chronic = $17.1 \mu g/L$, and for groundwater acute = $4.28 \mu g/L$ and chronic = $0.93 \mu g/L$) (**Table 10**).

Table 9. Tier I FIRST Model Surface Water EDWCs for Myclobutanil from Uses on Grass Grown for Seed, Grass Pastures, Rangeland, and Sod Farms						
Chemical	A	pplication		Peak Day (Acute)	Annual Average (Chronic)	
Surface Water	Rate (lb a.i./A)	Number	Interval (days)	Concentration (µg/L)		
Myclobutanil	0.20	4	14 days	46.9	17.1	
1,2,4-Triazole ^a	0.20ª	4	14	5.3	1.72	
Triazole Acetic Acid	-			9.74 ^b	3.16 ^b	
Triazole Alanine	-			11.98°	3.88°	

^a 1,2,4-Triazole application was obtained from molecular weight conversion times myclobutanil application rate times max percent formation rate (in this assessment: 1,2,4-Triazole = (69.0/288.78) * 0.20 lb a.i./A * 0.307)); b TAA = (127.10/69.0)*1,2,4-Triazole concentration.

For 1,2,4-triazole, the EDWCs (surface water peak = $5.3 \mu g/L$, chronic = $1.72 \mu g/L$, and groundwater acute = $3.79 \mu g/L$ and chronic = $2.43 \mu g/L$ for groundwater be used for the human health exposure assessment (**Table 10**). The triazole acetic acid (TAA) and triazole alanine (TA) are then estimated by assuming 100 % conversion and adjusting for the difference in molecular weight (mass). The TAA concentration is equal to (127.10/69.0)*1,2,4-Triazole concentration and the TA concentration is equal to TA = (156.15/69.0)*1.2.4-Triazole concentration (**Table 1**).

² Used to reassess the current maximum turf rate (6 applications at 1.3 lb a.i./A).

³ SCI-GROW input specifies a Koc rather than K_{ads} as an input value.

 $^{^{}c}$ TA = (156.15/69.0)*1,2,4-Triazole concentration.

¹² DP Barcode D289700. Nguyen, T. and Costello, K. June 9, 2003. Emergency Exemption Review: Myclobutanil on Peppers in California.

Table 10. PRZM-GW Tier I EDWCs (μg/L) for Myclobutanil and 1,2,4-Triazole from Uses on Grass Grown for Seed, Grass Pastures, Rangeland, and Sod Farms				
Scenario	Peak (Acute)	Simulation Average	Post-breakthrough Average	
Myclobutanil ^a				
Delmarva Sweet Corn	0.03	0.003	0.003	
FL Citrus	4.28	0.90	0.93	
FL Potato 30 yr	1.28	0.31	0.33	
100 yr	3.56	2.2	2.24	
GA Peanut	0.0005	4.4e ⁻⁵	5.1e ⁻⁵	
NC Cotton	0.002	0.0001	0.0001	
WI Corn 30 yr	8.3e ⁻¹⁰	4.6e ⁻¹¹	5.0e-11	
100 yr	0.032	0.003	0.003	
1,2,4-Triazole ^b				
Delmarva Sweet Corn	3.31	1.92	1.95	
FL Citrus	3.79	2.35	2.43	
FL Potato 30 yr	1.88	1.16	1.22	
GA Peanut	0.23	0.12	0.13	
NC Cotton	0.56	0.25	0.28	
WI Corn 30 yr	1.83	0.34	0.37	
100 yr	3.64	2.31	2.38	

^a Myclobutanil application rate: 4 applications @ 0.2 lb a.i./A)

The Tier 2 PRZM/EXAMS EDWCs for the currently registered turf uses are show in **Table 11** for the Pennsylvania and Florida Standard Turf scenarios. The highest 1-year in 10-year acute (peak) and annual mean concentrations were 218 and 172 μ g/L, respectively for the PA Turf scenario. The 30 year mean for the same scenario is 117 μ g/L.

	2 PRZM/EXAMS Surface Water kimum Use Rate.	EDWCs for Myclo	butanil Use on Turfgr	ass for Currently
Scenario	apps; rate; interval	1-Year in 10	- Year Concentration	30 Year
	(#; lb a.i./A; days)			
		Peak	Annual Average	Average
PA Turf	6; 1.30;14	147.3	115.1	93.4
FL Turf	6; 1.30;14	217.8	172.2	117.2

PCA = 0.95

Monitoring

Three monitoring studies were found which included myclobutanil. Two studies were located at drinking water sources (treatment facilities); finished and raw water samples were analyzed. The

b 1,2,4-Triazole application was obtained from molecular weight conversion times myclobutanil application rate times max percent formation rate (1,2,4-Triazole = (69.0/288.78) * 0.20 lb a.i./A * 0.307) = 0.01467 lb a.i./A)

monitoring studies were not targeted to myclobutanil use areas. Myclobutanil has also been included in the USGS National Water-Quality Assessment Program (NAWQA) Program. Myclobutanil monitoring data are summarized in **Tables 11 through 14**.

USDA, Pesticide Data Program (PDP).

The PDP is a program implemented by the USDA in 1991 to test commodities in the U.S. food supply for pesticide residues (2001). Sampling of finished drinking water was added after 2001. The PDP is a partnership with cooperation State Agencies responsible for sample collection and analysis of fresh and processed fruit and vegetables, grain, grain products, milk and dairy products, beef, pork, drinking water, and bottle water. Ten to twelve states participate in PDP program. In 2005, the twelve states were CA, CO, FL, MD, MI, MN, MT, NY, OH, TX, WA, and WI.

Paired samples of raw (untreated) intake and disinfected finished (treated) water were collected for analysis by the PDP in 2004 and 2006. Treated water samples were collected after the untreated samples at a time interval with the hydraulic residence time. The frequency of myclobutanil detections was 2 percent for the treated water and 1 percent for the untreated water (**Table 12**) in the 2006 samples. There were no detections in any of the other years. Triazoles and its conjugates were detected in several food commodities, but not in water samples in the PDP study.

Myclobutanil	No. of Samples	No. of Detects (year)	% samples with detection	Range of Detections ¹ (µg/L)	Range of LODs (µg/L)
Finished (treated)	288	0 (2001)	0	0	0.0113 - 0.100
Finished (treated)	582	0 (2002)	0	0	0.005 - 0.020
Finished (treated)	782	0 (2003)	0	0	0.005 - 0.020
Finished (treated)	380	0 (2004)	0	0	0.0013 - 0.0113
Unfinished (untreated)	381	0 (2004)	0	0	0.0013 - 0.0113
Finished (treated)	230	4 (2005)	1.7	0.019	0.0050 - 0.0113
Unfinished (untreated)	232	2 (2005)	0.9	0.019	0.0050 - 0.0113
Finished (treated)	336	0 (2006)	0	0	0.005 - 0.05
Unfinished (untreated)	337	0 (2006)	0	0	0.005 - 0.05

Only one distinct detected concentration or LOD value was reported for the pair.

<u>Reservoir Pilot Monitoring Program (USGS, 2001).</u> Myclobutanil was included in a study that monitored a number of water supply reservoirs and finished water (USGS, 2001). Residues were detected, at low concentrations, about 1 percent of 317 samples, in raw water with no detections in the finished water (**Table 13**). The degradation products were not included.

Table 13. Myclobutanil results from the summary of analysis of moderate-use pesticides and degradates in water samples from water supply intakes and finished-supply taps in Reservoir Pilot Monitoring Program. (USGS, 2001).

	No. of Samples	No. of Detections (Quantifiable No. of Detections)	Frequency of Detection (%)	Maximum Detection (μg/L)	Method Reporting Level (µg/L)
Raw Water	317	3 (2)	0.9	0.015	0.008
Finished Water	221	0	0	0	0.008

National Water Quality Analysis Program (NAQWA)(USGS, 2007)

Surface Water Analysis: Myclobutanil is detected in ambient surface water (**Table 14**) (Appendix 3). The detection frequency is 20.4 % (541/2647). The maximum daily myclobutanil concentration 0.507 μ g/L is for a sampling site (USGS Sampling Station # 2335870) in Cobb County, GA. Land use in the Cobb County, GA watershed is designated as urban. The maximum average myclobutanil concentration is 0.347 μ g/L for a sampling site (USGS Sampling Station # 3730112120393401) in Merced County, CA. The minimum reporting limit (MRL) varies from 0.0022 to 0.25 μ g/L with a median MRL of 0.008 μ g/L.

Table 14. Distribution of Myclobutanil Concentrations in USGS NAWQA Surface Water Monitoring Data Monitoring Data										
Exposure	Detects		Percentile							
Value	(%)	Max	99.9	99	95	90	80	70	60	50
Peak	20.4	0.507	0.486	0.344	0.074	0.033	0.033	0.033	0.010	0.008
Average	20.4	0.347	0.320	0.149	0.033	0.020	0.014	0.011	0.008	0.008

<u>Groundwater Analysis:</u> Myclobutanil is detected in groundwater (**Table 15**). The detection frequency is 0.15% (3/2061). Myclobutanil was detected in three wells. The maximum concentration $0.0338~\mu g/L$ is for a well (USGS Sampling Station # 295358095374101) in Harris County, TX. Land use in the Harris County recharge zone is designated as urban. The minimum reporting limit (MRL) varies from 0.0022 to $0.033~\mu g/L$ with a median MRL of $0.008~\mu g/L$.

Table 15. Distribution of Myclobutanil Concentrations in USGS NAWQA Groundwater Monitoring Data Monitoring Data								
Station ID Concentration (µg/L) Well Description								
295358095374101	0.0338	Harris County, TX; Well Depth 33.5 ft: Urban Land Use						
322237086112101	0.0208 Montgomery County, AL; Well Depth 31.5 ft; Urban Land Us							
465509119371501 0.0079 Grant County, Washington; Well Depth 15 ft; Ag Land Use								

Myclobutanil has been detected in ambient surface water and groundwater in samples collected for the USGS's National Water Quality Assessment Program (NAWQA, 2007). Twenty percent

(20.4%) of 2647 surface water samples had detectable levels of myclobutanil. The maximum peak concentration for surface water detected was $0.51\mu g/L$ and the maximum average concentration is $0.35\mu g/L$. The minimum reporting limit (MRL) varied from 0.00022 to 0.25 $\mu g/L$. In NAWQA, less than 1% (3 wells) of 2061 wells had detectable levels of myclobutanil with MRLs ranging from 0.0022 to 0.033 $\mu g/L$. These monitoring studies were not specifically conducted for myclobutanil. Additionally, myclobutanil is generally not included in many monitoring studies. Myclobutanil was detected in a limited number of samples collected at different at drinking water sources. When detections occurred, 1- to 2 percent of the samples contained low levels of myclobutanil. The maximum concentration was of 0.019 $\mu g/L$.

REFERENCES

- Burns, L. A. 2002. EXAMS (Exposure Analysis Modeling System) Version 2.98.04. Environmental Research Laboratory. U. S. Environmental Protection Agency. Athens, GA.
- Carsel et al. 1997. PRZM (Pesticide Root Zone Model) Version 3.12. Environmental Research Laboratory. U. S. Environmental Protection Agency. Athens, GA.
- FIRST. 2005. FIRST (FQPA Index Reservoir Screening Tool, Environmental Fate and Effects Division, Office of Pesticide Programs, U.S. Environmental Protection Agency, Tier I A Screening Model estimate Pesticide concentrations in Drinking Water. Version 1.1.0, December 12, 2005, Arlington, VA. http://www.epa.gov/oppefed1/models/water/#first
- Maher, I., N. Elkassabany, and J. Hetrick. 2006. Memorandum: 1,2,4-Triazole, Triazole Alanine, Triazole Acetic Acid: Drinking Water Assessment in Support of Reregistration and Registration Actions for Triazole-derivative Fungicide Compounds. Risk Assessment Type: Single Chemical Aggregate PC Code: 600074 1,2,4- Triazole; 600011 Triazole Alanine; 600082 Triazole Acetic Acid. (DP Barcode D320682; 02/28/2006). U.S. Environmental Protection Agency, Office of Pesticide Programs, Environmental Fate and Effects Division. Arlington, VA.
- SCI-GROW. 2001. SCI-GROW (Screening Concentration In Ground Water). (Version 2.2; November 1, 2001). Environmental Fate and Effects Division, Office of Pesticide Programs, U.S. Environmental Protection Agency, Arlington, VA. http://www.epa.gov/oppefed1/models/water/#scigrow
- USDA. 2001 to 2006. Pesticide Data Program (PDP). Annual Summary Calendar, Year 2005. USDA-AMS-S&T-Monitoring Programs Office. Manassas, VA. http://www.ams.usda.gov/science/pdp/Index.htm
- USEPA. 2009. Guidance for Selecting Input Parameters in Modeling the Environmental Fate and Transport of Pesticides. Version 2.1 October 22, 2009. U.S. Environmental Protection Agency, Office of Pesticide Programs, Environmental Fate and Effects Division. Arlington, VA. http://www.epa.gov/oppefed1/models/water/input_parameter_guidance.htm#guidance
- USEPA. 2006. Standard Soil Mobility Classification Guidance. Memorandum From S. Bradbury to Environmental Fate and Effects Division. January 23, 2004. Environmental Fate and Effects Division. Office of Pesticide Programs. United States Environmental Protection Agency.
- USGS. 2001. J. Bloomquist, J. Denis, J. Cowles, J. Hetrick, R. Jones, and N. Birchfield. Pesticides in Selected Water-Supply Reservoirs and Finished Drinking Water, 1999-2000: Summary of Results from a Pilot Monitoring Program. Open File Report 01-456
- USGS. 2007. National Water-Quality Assessment (NAWQA) Program. Data-warehouse http://water.usgs.gov/nawqa/data.html

Appendix 1. Additional Environmental Fate Discussion

The method used to determine the aerobic soil metabolism (MRID 164561) half-lives (61 to 71 days; MRID 00164561, page 5) reported in earlier DERs could not be replicated. The half-lives appear to have been obtained by only considering a portion of the data (<than 90 days). The pattern of decline appears to fit the common degradation pattern termed the "hockey stick". An analysis of degradation kinetics was conducted to derive the best description of the measured decline curves in aerobic soil metabolism studies. The entire data set (0 to 367 days) and a portion of the data (0 to 90 days) were analyzed using linear regression of the ln-transformed data and non-linear regression of the untransformed data.

The following equations and assumptions were made (based upon draft guidance being developed by the Fate Tech Team, Eckel, 1/2007.

eq 1. dC/dt = -kCⁿ
if n=1, then
$$\ln(C_0/C)$$
 = -kt (first order equation)
if n \neq 1 then
eq. 2.(1/(n-1))*((1/Cⁿ⁻¹) - (1/C₀ⁿ⁻¹)) = -kt
C =((n-1)*k*t + (1/co^(n-1)))^(-1/(n-1)); co = Co/100

The rings of myclobutanil, triazole and chlorophenyl rings were labeled [¹⁴C), thus, the decline (of radioactivity) of myclobutanil was measured by each ring. The formation and decline of 1,2,4-triazole could also be tracked with the triazole ring.

Assuming first-order kinetics (eq. 1) a half-life ($T_{1/2}$) was calculated using linear regression on the ln-transformed concentration versus time (time = 0 to 90 days or time = 0 to 367) and a DT₅₀ was calculated using non-liner regression (the Levenberg-Marquardt least squares method for curve fitting) of concentration versus time (time = 0 to 90 days or time = 0 to 367). The decay rate (k, or slope) and R^2 are summarized in **Appendix 1, Table 1**.

The second equation (eq 2.) result using all the data (0 to 367 days) fit the data points (Levenberg-Marquardt least squares), but was not a first order.

Parent (myclobutanil)									
Regression		Time (days)	k (days ⁻¹)	R ²	n				
Linear	lnC = lnCo exp (-kt)	90	0.0096 ^a	0.99	1				
			0.0077 ^b	0.97	1				
Linear		367	0.0035	0.81	1				
			0.0031	0.82	1				
Nonlinear	C=CoExp(-kt)	90	0.10	0.99	1				
			0.0091	0.95	1				
		367	0.0067	0.83	1				

Parent (myclobutanil)										
Regression		Time (days)	k (days ⁻¹)	R ²	n					
			0.0058	0.77	1					
Nonlinear-N st order	C ^c	367	0.01676	0.98	n = 2.929					
					co = 1.012					
	M	yclobutanil + 1,2	,4-triazole							
Regression	$lnC = lnCo \exp(-kt)$	Time (days)								
Linear		90	0.0058 ^a	0.96	1					
Linear		367	0.0022	0.85	1					
Nonlinear	C=CoExp(-kt)	90	0.0069	0.92	1					
Nonlinear		367	0.0037	0.68	1					
Nonlinear-N st order	Cc	367	0.01434	0.978	n = 4.789					
					$c_0 = 0.978$					

^a Triazole ring labeled will include 1,2,4-triazole.

Appendix 1. Table 2 summarizes the distribution of measured radioactivity, and the estimated half-life or DT_{50} , DT_{75} , and 367 days (end of study). The rate constant (k /day) and coefficient of determination (R^2) is also shown. From a statistical stand point (the linear and nonlinear methods) were significant (slopes) and the R^2 were fair to good, and therefore, acceptable. But in reality the linear or nonlinear methods did not fit the data very well. Either the method it fit the data well at times less than 90 days, but not at day 367 or more, or it fit at both ends, but not in the middle.

The non-linear, n-order curve fitting equation (eq. 2) fit the data also exactly. Unfortunately, it is not a first-order equation.

In summary, neither the first-order linear regression nor nonlinear regression (curve fitting) gives totally satisfactory results. When only part of the data is used the initial decline can be fit quite well, but the later data is underestimated. Using all the data, over estimated the half-life (or DT_{50}), but under estimated the DT_{70} or DT_{90} . The first-order linear regression (transform data), using all the data, was the only method that gave a reasonable estimate of the residue remaining at the end of the study (367). Neither DT_{75} or DT_{90} were reached in the study, the residues remaining at day 367 was used to evaluate the results. This was selected because it was the most conservative as it fit the data best at both the beginning and end of the study. This would result in a conservative estimate of myclobutanil concentrations in water.

^b Chlorophenyl ring label.(1,2,4-triazole not label)

 $^{^{}c}C = ((n-1)*k*t + (1/co^{(n-1)}))^{(-1/(n-1))}; co = Co/100$

Appendix 1, Table 2. Sur myclobutanil + 1,2,4 triaz					myclobutar	il and	
PARENT ONLY	Half-life or DT50 50% decline	DT75 75% decline	DT90 90% decline	% Radioactivity at 367 days	Rate constant	Coefficient of Determination	
Triazole Label Position	Time (days)				Days ⁻¹	R ²	
Observed Myclobutanil	75	>365	>365	29	-		
Liner Regression (t <100 days)	72.2	144	239	3.0	0.0096	0.99	
Linear Regression (all)	198.0	396	657	27.9	0.0035	0.81	
Nonlinear 1 st order (t < 100 days)	69.3	138	230	2.6	0.010	0.99	
Nonlinear 1 st order	103.5	206	343	8.7	0.0067	0.83	
Nonlinear n st order	87.6	400	2600	26.7	0.0167	0.98	
Observed Chlorophenyl Label	90	>365	>365	33			
Liner Regression (t <100 days)	90	180	299	6.0	0.0077	0.97	
Linear Regression (all)	224	447	742	32.3	0.0031	0.82	
Nonlinear 1 st order (t<100 days)	76	152	253	3.6	0.0091	0.95	
Nonlinear 1 st order	113	237	354	11.6	0.0059	0.77	
Nonlinear n st order	103	630	>1000	31.2	0.0164	0.98	
PARENT + DEGRADATE							
Observed Myclobutanil + 1,2,4 triazole	220	>365	>365	42			
Liner Regression (t <100 days)	119.5	239	397	12.0	0.0058	0.96	
Linear Regression (all)	315.1	630	1047	44.8	0.0022	0.85	
Nonlinear 1 st order (t<100 days)	100.5	201	334	8.1	0.0069	0.92	
Nonlinear 1 st order	186.3	372	619	25.9	0.0037	0.68	
Nonlinear n st order	235.2			44.85	0.0144	0.98	

APPENDIX 2. FIRST and SCI-GROW OUTPUTS

ONE (MULT	') INTERV	S & SOIL SC AL Kd ()	PP M) (%D)	RIFT)	AREA (II
		4 5.0			
		ID RESERVOIR H			
METABOLIC (FIELD)	DAYS UNTIL RAIN/RUNOFF	HYDROLYSIS (RESERVOIR)	PHOTOLYSIS (RESEFF)	METABOI (RESER.	LIC COMBIN
		N/A			
		(MICROGRAMS/L			· · · · · · · · · · · · · · · · · · ·
	CON	(ACUTE) ICENTRATION	CC	NCENTRATIO	N
		46.898		17.153	
No 1 FOR	2 124triagole	on or		TNDIIT VALI	TIPC *
RATE (#/AC) ONE(MULT)	No.APPS & INTERVAL	e ON gra SOIL SOLUB Kd (PPM	ass * IL APPL TYP) (%DRIFT)	E %CROPPEI AREA	D INCORP (IN)
RATE (#/AC) ONE(MULT)	No.APPS & INTERVAL	SOIL SOLUB	ass * IL APPL TYP) (%DRIFT)	E %CROPPEI AREA	D INCORP (IN)
RATE (#/AC) ONE(MULT) .015(.055	No.APPS & INTERVAL	SOIL SOLUB	ass * IL APPL TYP) (%DRIFT)	E %CROPPEI AREA	D INCORP (IN)
RATE (#/AC) ONE (MULT) .015 (.055 FIELD AND RE	No.APPS & INTERVAL 1 4 14 SERVOIR HALF	SOIL SOLUB Kd (PPM) .7*****	ass * IL APPL TYP (%DRIFT) AERIAL(16	E %CROPPEI AREA .0) 100.0	D INCORP (IN) .0
RATE (#/AC) ONE (MULT) .015 (.055 FIELD AND RE	No.APPS & INTERVAL) 4 14 SERVOIR HALE DAYS UNTIL H	SOIL SOLUB Kd (PPM) .7***** FLIFE VALUES (I	ASS * IL APPL TYP) (%DRIFT) * AERIAL(16 DAYS) HOTOLYSIS M RESEFF) (E %CROPPEI AREA .0) 100.0 ETABOLIC (RESER.)	D INCORP (IN) .0
RATE (#/AC) ONE(MULT) .015(.055 FIELD AND RE METABOLIC D (FIELD) RA	No.APPS & INTERVAL 1 14 SERVOIR HALF AYS UNTIL HAIN/RUNOFF (SOIL SOLUB: Kd (PPM) .7***** FLIFE VALUES (I IYDROLYSIS PR RESERVOIR) (I 161.00 .0	ass *	E %CROPPEI AREA .0) 100.0 ETABOLIC (RESER.) .00	D INCORP (IN) .0
RATE (#/AC) ONE (MULT) O15 (.055 FIELD AND RE METABOLIC D (FIELD) RA 250.00 INTREATED WA	No.APPS & INTERVAL INTERVAL A 14 SERVOIR HALF AYS UNTIL HAIN/RUNOFF (2 TER CONC (MI	SOIL SOLUB: Kd (PPM) .7***** PLIFE VALUES (I IYDROLYSIS PR RESERVOIR) (I 161.00 .0	ASS * IL APPL TYP (%DRIFT) * AERIAL(16 DAYS) HOTOLYSIS M RESEFF) (0000 R (PPB)) Ver ERAGE (CHRONI ENTRATION	E %CROPPEI AREA .0) 100.0 ETABOLIC (RESER.) .00	D INCORP (IN) .0 COMBINED (RESER.) 161.00

SCIGROW Model Output File: (Parent Only) Grass Grown for Seed, Grass Pastures, Rangeland, and Sod Farms

SCIGROW

VERSION 2.3

ENVIRONMENTAL FATE AND EFFECTS DIVISION
OFFICE OF PESTICIDE PROGRAMS
U.S. ENVIRONMENTAL PROTECTION AGENCY
SCREENING MODEL

FOR AQUATIC PESTICIDE EXPOSURE

SciGrow version 2.3 chemical:1,2,4-triazole time is 10/10/2012 13:22:30

Application rate (lb/acre)	Number of applications	Total Use (lb/acre/yr)	Koc (ml/g)	Soil Aerob metabolism	
0.015	4.0	0.059	1.04E+02	250.0	
groundwater scre	_ ,	•		* * * * * * * * * * * *	*****

PRZM-GW Input Florida Citrus Parent Myclobutanil

```
10/10/2012 1:33:15 PM; myclobutanil parent; Florida Citrus - FL Central
Ridge, Polk County - (Tampa) Met File (12842.dvf) - Astatula sand, hrgb A
User Interface Version: PRZM-GW (Version 1.00)
***Record 3
              0
                     0
   0.78
                            33
                                     1
                                             1
***Record 6
      0
***Record 8
      1
***Record 9
                    200
      1 0.25
                        60
                                     1 10 10 10
                                                       0
                                                              100
***Record 10
     30
***Record 11
  010161 010261 311261
                             1
  010162 010262 311262
                             1
 010163 010263 311263
                             1
 010164 010264 311264
                             1
 010165 010265 311265
 010166 010266 311266
                             1
  010167 010267 311267
                             1
  010168 010268 311268
                             1
  010169 010269 311269
                             1
                             1
 010170 010270 311270
 010171 010271 311271
 010172 010272 311272
 010173 010273 311273
                             1
 010174 010274 311274
 010175 010275 311275
                             1
 010176 010276 311276
                             1
  010177 010277 311277
  010178 010278 311278
                             1
  010179 010279 311279
                             1
  010180 010280 311280
                             1
  010181 010281 311281
                             1
 010182 010282 311282
                             1
                             1
 010183 010283 311283
 010184 010284 311284
 010185 010285 311285
                             1
  010186 010286 311286
                             1
 010187 010287 311287
                             1
 010188 010288 311288
                             1
 010189 010289 311289
                             1
 010190 010290 311290
***Record 12
Place Holder
***Record 13
    120
              1
                     0
                             0
***Record 15
Place Holder
***Record 16
 10 261 0 2
                4 0.224
                          1
                               0
 24 261 0 2
                4 0.224
                               0
                          1
 10 361 0 2
                4 0.224
                          1
                               0
 24 361 0 2
                4 0.224
                          1
                               0
```

10	262	0	2	4	Ω	.224	1	0
24	262	0	2	4		.224	1	0
10	362	0	2	4		.224	1	0
24	362	0	2	4		.224	1	0
10	263	0	2	4		.224	1	0
24	263	0	2	4		.224	1	0
10	363	0	2	4		.224	1	0
24	363	0	2	4	0	.224	1	0
10	264	0	2	4	0	.224	1	0
24	264	0	2	4	0	.224	1	0
10	364	0	2	4	0	.224	1	0
24	364	0	2	4		.224	1	0
10	265	0	2	4		.224	1	0
24	265	0	2	4		.224	1	0
10	365		2	4		.224		
		0					1	0
24	365	0	2	4		.224	1	0
10	266	0	2	4		.224	1	0
24	266	0	2	4		.224	1	0
10	366	0	2	4	0	.224	1	0
24	366	0	2	4	0	.224	1	0
10	267	0	2	4	0	.224	1	0
24	267	0	2	4	0	.224	1	0
10	367	0	2	4		.224	1	0
24	367	0	2	4		.224	1	0
10	268	0	2	4		.224	1	0
24	268	0	2	4		.224	1	
								0
10	368	0	2	4		.224	1	0
24	368	0	2	4		. 224	1	0
10	269	0	2	4		.224	1	0
24	269	0	2	4		. 224	1	0
10	369	0	2	4	0	.224	1	0
24	369	0	2	4	0	.224	1	0
10	270	0	2	4	0	.224	1	0
24	270	0	2	4		. 224	1	0
10	370	0	2	4		.224	1	0
24	370	0	2	4		.224	1	0
10	271	0	2	4		.224	1	0
24	271	0	2	4		.224	1	
			2					0
10	371	0		4		.224	1	0
24	371	0	2	4		.224	1	0
10	272	0	2	4		.224	1	0
24	272	0	2	4		.224	1	0
10	372	0	2	4		.224	1	0
24	372	0	2	4	0	.224	1	0
10	273	0	2	4	0	.224	1	0
24	273	0	2	4	0	.224	1	0
10	373	0	2	4		.224	1	0
24	373	0	2	4		. 224	1	0
10	274	0	2	4		.224	1	0
24	274	0	2	4		.224	1	0
10	374	0	2	4		.224	1	
								0
24	374	0	2	4		.224	1	0
10	275	0	2	4		.224	1	0
24	275	0	2	4		.224	1	0
10	375	0	2	4		.224	1	0
24	375	0	2	4		.224	1	0
10	276	0	2	4	0	.224	1	0

24	276	0	2	4	0.224	1	0
	376	0	2	4	0.224	1	0
10							
24	376	0	2	4	0.224	1	0
10	277	0	2	4	0.224	1	0
24	277	0	2	4	0.224	1	0
10	377	0	2	4	0.224	1	0
24	377	0	2	4	0.224	1	0
10	278	0	2	4	0.224	1	0
24	278	0	2	4	0.224	1	0
10	378	0	2	4	0.224	1	0
24	378	0	2	4	0.224	1	0
10	279	0	2	4	0.224	1	0
24	279	0	2	4	0.224	1	0
10	379	0	2	4	0.224	1	0
			2				
24	379	0		4	0.224	1	0
10	280	0	2	4	0.224	1	0
24	280	0	2	4	0.224	1	0
10	380	0	2	4	0.224	1	0
24	380	0	2	4	0.224	1	0
10	281	0	2	4	0.224	1	0
24	281	0	2	4	0.224	1	0
10	381	0	2	4	0.224	1	0
24	381	0	2	4	0.224	1	0
10	282	0	2	4	0.224	1	0
24	282	0	2	4	0.224	1	0
10	382	0	2	4	0.224	1	0
24	382	0	2	4	0.224	1	0
10	283	0	2	4	0.224	1	0
24	283	0	2	4	0.224	1	0
10	383	0	2	4	0.224	1	0
24	383	0	2	4	0.224	1	0
10	284	0	2	4	0.224	1	0
24	284	0	2	4	0.224	1	0
10	384	0	2	4	0.224	1	0
24	384	0	2	4	0.224	1	0
10	285	0	2	4	0.224	1	0
24	285	0	2	4	0.224	1	0
10	385	0	2	4	0.224	1	0
24	385	0	2	4	0.224	1	0
10	286	0	2	4	0.224	1	0
24	286	0	2	4	0.224	1	0
10	386	0	2	4	0.224	1	0
24		0	2	4	0.224	1	0
	386						
10	287	0	2	4	0.224	1	0
24	287	0	2	4	0.224	1	0
10	387	0	2	4	0.224	1	0
24	387	0	2	4	0.224	1	0
10	288	0	2	4	0.224	1	0
24	288	0	2	4	0.224	1	0
10	388	0	2	4	0.224	1	0
24	388	0	2	4	0.224	1	0
10	289	0	2	4	0.224	1	0
24	289	0	2	4	0.224	1	0
10	389	0	2	4	0.224	1	0
24	389	0	2	4	0.224	1	0
10	290	0	2	4	0.224	1	0
24	290	0	2	4	0.224	1	0
_							

```
10 390 0 2 4 0.224
                  1
24 390 0 2 4 0.224
                      0
***Record 17
 0
          3
             0
***Record 18
0
              0.5
***Record 19
Place Holder
***Record 20
  400
            0 0
                  0
                     0 0 2 1 1 0
***Record 26
 0
***Record 27
 4 0.1
            0.90
                    7.0
***Record 31
 2 2
         2
             2 2
                    2 2
                          2
                               2 2 2 2 0.97 10.0
***Record 32
 21 21 21
             21 21
                    21 21
                          21
                               21
                                   21
                                      21
                                          21
***Record 32A
 2.00 25.0
***Record 33
  8
*** Record 34,36,37 Horizon 1
   1 10 1.35 0.11 0 0
      0.00276 0.00276
                   0
                  0.014
                              5.03
       1 0.11
                        0.144
         21
             96
                         0
                                 0
*** Record 34,36,37 Horizon 2
    2 10 1.58 0.1
                                0
                           0
                                        0
                  0
      0.00261 0.00261
          5 0.1
                  0.016
                         0.144
                                5.03
             95 2.8
          21
                         0
                                0
*** Record 34,36,37 Horizon 3
    3 20 1.58 0.1
                         0
                                0
                                        0
      0.00215 0.00215
                    0
          20 0.1
                  0.016
                         1.44
                                5.03
          21
              95 2.8
                          0
                                0
*** Record 34,36,37 Horizon 4
    4 20 1.45 0.2
0.00153 0.00153 0
                                0
                                        0
       20 0.2 0.015
                               5.03
                        0.144
              95
                  2.8
                         0
                                0
          21
*** Record 34,36,37 Horizon 5
     5 20 1.5 0.1
0.00092 0.00092 0
                         0
                                0
                                        Ω
                  0.015
         20 0.1
                        0.144
                                5.03
                  2.8
                         0
                                 0
          21
               95
*** Record 34,36,37 Horizon 6
     6 20 1.5 0.24
                                 0
     0.0003070.000307
                   0
                  0.015
          20 0.24
                                5.03
                         0.144
          21
              95
                  2.8
                         0
                                0
*** Record 34,36,37 Horizon 7
         200 1.59 0.10
     7
                                0
                                        0
                           0
              0 0
          0
          50
              0.10 0.014
                        0.144
          21
              96 2.8
                         0
                                0
```

```
*** Record 34,36,37 Horizon 8
           100 1.58 0.3997
                                0
                                      0
                                               0
                  0
                          0
            50 0.3997
                      0.001
                             0.144
                                     5.03
            21
                  87
                         11
                                 0
                                         0
*** Record 40
     0
*** Record 42
          YEAR
                  10
                              YEAR
                                    10
                                                    YEAR
                                                             10
*** Record 45
          YEAR
      3
*** Record 46
   DCON1
          TAVE 21 22 1.0E3
   INFL
          TCUM 21 21 0.0244
   IRRG
          TSER
```

PRZM-GW Input Florida Citrus 1,2,4-Triazole

010183 010283 311283

```
10/10/2012 1:46:58 PM; 1,2,4-triazol; Florida Citrus - FL Central Ridge, Polk
County - (Tampa) Met File (12842.dvf) - Astatula sand, hrgb A
User Interface Version: PRZM-GW (Version 1.00)
***Record 3
   0.78
                    0
                          3.3
                                 1
                                            1
***Record 6
     0
***Record 8
     1
***Record 9
      1
         0.25
                  200
                          60
                                    1 10 10 10
                                                      0
                                                           100
***Record 10
     30
***Record 11
 010161 010261 311261
                            1
 010162 010262 311262
                             1
 010163 010263 311263
 010164 010264 311264
                             1
 010165 010265 311265
                             1
 010166 010266 311266
                             1
 010167 010267 311267
                             1
 010168 010268 311268
                            1
 010169 010269 311269
 010170 010270 311270
                             1
 010171 010271 311271
                             1
 010172 010272 311272
 010173 010273 311273
                            1
 010174 010274 311274
                            1
 010175 010275 311275
 010176 010276 311276
 010177 010277 311277
                            7
 010178 010278 311278
                            1
 010179 010279 311279
 010180 010280 311280
                            1
 010181 010281 311281
                            1
 010182 010282 311282
                            1
```

010 010 010 010 010 ***Re	0184 0185 0186 0187 0188 0189 0190 ecord e Holo	020000000000000000000000000000000000000	3	31128; 31128; 31128; 31128; 31128; 31129;	5 6 7 8 9 0	1 1 1 1 1 1
+++D	120 ecord	19	1		0	0
	e Hold					
	ecord	10				
10	261	0	2	40.016	4 1	0
24	261	0	2	40.016		0
10	361	0	2	40.016	4 1	0
24	361	0	2	40.016	4 1	0
10	262	0	2	40.016	4 1	0
24	262	0	2	40.016		0
10	362	0	2	40.016		0
24	362	0	2	40.016		0
10	263	0	2 2	40.016		0
24 10	263 363	0	2	40.016		0
24	363	0	2	40.016		0
10	264	0	2	40.016		0
24	264	0	2	40.016		0
10	364	0	2	40.016		0
24	364	0	2	40.016		0
10	265	0	2	40.016	4 1	0
24	265	0	2	40.016	4 1	0
10	365	0	2	40.016	4 1	0
24	365	0	2	40.016		0
10	266	0	2	40.016		0
24	266	0	2	40.016		0
10	366	0	2	40.016		0
24 10	366 267	0	2	40.016		0
24	267	0	2	40.016	_	0
10	367	0	2	40.016		0
24	367	0	2	40.016		0
10	268	0	2	40.016		0
24	268	0	2	40.016	4 1	0
10	368	0	2	40.016		0
24	368	0	2	40.016		0
10	269	0	2	40.016		0
24	269	0	2	40.016		0
10	369	0	2	40.016		0
24 10	369 270	0	2	40.016		0
24	270	0	2	40.016		0
10	370	0	2	40.016		0
24	370	0	2	40.016		0
10	271	0	2	40.016		0
24	271	0	2	40.016		0
10	371	0	2	40.016	4 1	0

24	371	0	2	40.0164	1	0
10	272	0	2	40.0164	1	0
24	272	0	2	40.0164	1	0
10	372	0	2	40.0164	1	0
24	372	0	2	40.0164	1	0
10	273	0	2	40.0164	1	0
24	273	0	2	40.0164	1	0
10	373	0	2	40.0164	1	0
24	373	0	2	40.0164	1	0
10	274	0	2	40.0164	1	0
24	274	0	2	40.0164	1	0
10	374	0	2	40.0164	1	0
24	374	0	2	40.0164	1	0
10	275	0	2	40.0164	1	0
24	275	0	2	40.0164	1	0
10	375	0	2	40.0164	1	0
24	375	0	2	40.0164	1	0
10	276	0	2	40.0164	1	0
24	276	0	2	40.0164	1	0
10	376	0	2	40.0164	1	0
24	376	0	2	40.0164	1	0
10	277	0	2	40.0164	1	0
24	277	0	2	40.0164	1	0
10	377	0	2	40.0164	1	0
24	377	0	2	40.0164	1	0
10	278	0	2	40.0164	1	0
24	278	0	2	40.0164	1	0
10	378	0	2	40.0164	1	0
24	378	0	2	40.0164	1	0
10	279	0	2	40.0164	1	0
24	279	0	2	40.0164	1	0
10	379	0	2	40.0164	1	0
24	379	0	2	40.0164	1	0
10	280	0	2	40.0164	1	0
24	280	0	2	40.0164	1	0
10	380	0	2	40.0164	1	0
24	380	0	2	40.0164	1	0
10	281	0	2	40.0164	1	0
24	281	0	2	40.0164	1	0
10	381	0	2	40.0164	1	0
24	381	0	2	40.0164	1	0
10	282	0	2	40.0164	1	0
24	282	0	2	40.0164	1	0
10	382	0	2	40.0164	1	0
24	382	0	2	40.0164	1	0
10	283	0	2	40.0164	1	0
24	283	0	2	40.0164	1	0
10	383	0	2	40.0164	1	0
24	383	0	2	40.0164	1	0
10	284	0	2	40.0164	1	0
24	284	0	2	40.0164	1	0
10	384	0	2	40.0164	1	0
24	384	0	2	40.0164	1	0
10	285	0	2	40.0164	1	0
24	285	0	2	40.0164	1	0
10	385	0	2	40.0164	1	0
24	385	0	2	40.0164	1	0

```
10 286 0 2
            40.0164
                    1
 24 286 0 2
             40.0164
                     1
                          0
            40.0164
                    1
 10 386
       0 2
                          0
            40.0164
                     1
                         0
 24 386
       0 2
 10 287
       0 2
            40.0164
                     1
                         0
 24 287 0 2
            40.0164
                          0
            40.0164
 10 387 0 2
                     1
                          0
            40.0164
                     1
 24 387 0 2
                          0
 10 288
       0 2
             40.0164
                     1
                          0
 24 288 0 2
            40.0164
                          0
                     1
 10 388 0 2
           40.0164
                     1
                          0
 24 388 0 2
            40.0164
                     1
                          0
 10 289 0 2
            40.0164
                          0
                      1
 24 289 0 2
            40.0164
                      1
                          0
 10 389 0 2
             40.0164
                      1
                          0
            40.0164
 24 389
                     1
       0 2
                          0
 10 290 0 2
            40.0164
                     1
                         0
 24 290 0 2
           40.0164
                     1
                         0
 10 390 0 2
            40.0164
                     1
                          0
 24 390 0 2
            40.0164
                     1
                        0
***Record 17
  0
           3 0
***Record 18
  0
               0.5
          0
***Record 19
Place Holder
***Record 20
  400
              0 0
                    0
                       0
                          0 2 1 1 0
***Record 26
  0
          0
                 0
***Record 27
 4 0.1
              0.90
                      7.0
***Record 31
  2 2
              2 2
                      2 2
                             2
                                  2
                                     2 2 2 0.97 10.0
***Record 32
  21 21 21
              21 21
                      21
                          21
                                      21
                              21
                                  21
                                          21
                                              21
***Record 32A
  2.00 25.0
***Record 33
  8
*** Record 34,36,37 Horizon 1
     1 10 1.35 0.11
                            0
                                  0
                                          0
       0.00431 0.00277
                    0
              0.11
                    0.014
           1
                           0.144
                                  0.72
                    2.4
               96
           21
                             0
                                    0
*** Record 34,36,37 Horizon 2
     2 10 1.58 0.1
                                     0
                                           0
       0.00431 0.00262
                      0
          5 0.1
                    0.016
                                  0.72
                           0.144
           21
                95 2.8
                            0
                                   0
*** Record 34,36,37 Horizon 3
     3 20 1.58 0.1
                             0
                                    0
                                           0
       0.00431 0.00216
                      0
                    0.016
           20 0.1
                           1.44
                                  0.72
          21
               95
                    2.8
                            0
                                   0
*** Record 34,36,37 Horizon 4
     4 20 1.45 0.2
                                    0
```

```
0.00431 0.00154 0
              20 0.2 0.015
                                  0.144
                                            0.72
              21
                     95
                         2.8
*** Record 34,36,37 Horizon 5
                                              0
             20
                   1.5
                         0.1
                                      0
                                                      0
         0.004310.000924
                         0.015
             20
                   0.1
                                           0.72
                                  0.144
                     95
             21
                            2.8
                                      0
                                              0
*** Record 34,36,37 Horizon 6
             20
                    1.5
                           0.24
                                      0
                                              0
                                                      0
         0.004310.000308
                           0
             20
                 0.24
                          0.015
                                   0.144
                                            0.72
              21
                     95
                            2.8
                                      0
                                              0
*** Record 34,36,37 Horizon 7
            200
                   1.59
                           0.10
                                              0
                                                      0
         0.00431
                     0
              50
                   0.10
                         0.014
                                  0.144
                                           0.72
                    96
             21
                          2.8
                                      0
                                              0
*** Record 34,36,37 Horizon 8
            100 1.58 0.3997
                                      0
                                                      0
      8
                                              0
        0.00431
                    0
             50 0.3997
                          0.001
                                  0.144
                                            0.72
                                      0
              21
                     87
                             11
                                              0
*** Record 40
*** Record 42
                     10
                                   YEAR
                                                           YEAR
           YEAR
                                             10
                                                                     10
                                                                          0
*** Record 45
      3
           YEAR
*** Record 46
   DCON1
           TAVE 21
                     22 1.0E3
                 21
                          0.028
   INFL
           TCUM
                     21
   IRRG
           TSER
```

PRZM/EXAMS for maximum turfgrass use (6 applications @ 1.3 lb a.i./acre)

stored as PAturf6u.out Chemical: Myclobutanil PRZM environment: PAturfSTD.txt modified Thuday, 23 February 2006 at 17:55:08 EXAMS environment: ir298.exv modified Tueday, 26 August 2008 at 05:14:08 Metfile: w14751.dvf modified Tueday, 26 August 2008 at 05:15:00 Water segment concentrations (ppb) Year Peak 96 hr 21 Day 60 Day 90 Day Yearly 1961 57.05 56.76 55.65 53.39 51.54 16.45 1962 98.72 98.31 97.34 94.72 92.56 55.2

1963 116 116 114 111 108 1964 119 119 117 115 113 96.07 1965 121 121 119 116 114 97.89 1966 221 220 217 215 212 127 1967 196 195 193 187 183 1968 182 181 178 175 173 145 1969 163 162 160 156 153 138 1970 140 133 130 139 137 119 1971 136 135 133 130 128 112

```
1976
      230
            229
                   226
                         219
                               215
                                      195
1977
      197
            197
                   194
                         189
                               185
                                      166
1978
      161
            160
                   158
                         154
                               151
                                      137
                               156
                                      126
1979 165
            165
                   162
                         159
1980 186
            185
                   182
                         176
                               165
                                      133
            166
1981 166
                   164
                         159
                               156
                                      141
1982 141
            140
                   139
                         135
                               133
                                      123
1983
      130
            129
                   127
                         124
                               122
                                      112
1984
      121
            120
                   119
                         116
                               114
                                      103
                   149
                                      107
1985
     152
            152
                         146
                               144
1986
     136
            136
                   134
                         130
                               127
                                      117
1987
     148
            147
                   145
                         142
                               139
                                      112
1988 134
                   132
                         128
                               125
                                      116
            133
1989
      146
            145
                   143
                         139
                               136
                                      112
1990 139
                   137
                         132
                               130
                                      115
            139
Sorted results
Prob. Peak 96 hr 21 Day
                               60 Day
                                            90 Day
                                                         Yearly
0.032258064516129 255
                         254
                               251
                                      249
                                            246
                                                   195
0.0645161290322581
                         250
                               249
                                      246
                                            242
                                                   240
                                                         191
0.0967741935483871
                         230
                               229
                                      226
                                            219
                                                   215
                                                         183
0.129032258064516 223
                               220
                                      215
                                            212
                                                   166
                         223
0.161290322580645 221
                         220
                               217
                                      213
                                            208
                                                   163
0.193548387096774 197
                         197
                               194
                                      189
                                            185
                                                   149
0.225806451612903 196
                         195
                               193
                                      187
                                            183
                                                   145
0.258064516129032 186
                         185
                               182
                                      176
                                            173
                                                   141
0.290322580645161 182
                         181
                               178
                                      175
                                            165
                                                   138
0.32258064516129 166
                         166
                               164
                                      159
                                            156
                                                   137
0.354838709677419 165
                         165
                               162
                                      159
                                            156
                                                   133
0.387096774193548 163
                               160
                                      156
                                            153
                                                   127
                         162
0.419354838709677 161
                         160
                               158
                                      154
                                            151
                                                   126
0.451612903225806 152
                               149
                                      146
                                                   123
                         152
                                            144
0.483870967741936 148
                               145
                                            139
                                                   119
                         147
                                      142
0.516129032258065 146
                         145
                               143
                                      139
                                            136
                                                   117
0.548387096774194 143
                         143
                               141
                                      136
                                            133
                                                   116
0.580645161290323 141
                         140
                               139
                                      135
                                            130
                                                   115
0.612903225806452 140
                         139
                               137
                                      133
                                            130
                                                   112
0.645161290322581 139
                               137
                         139
                                      132
                                            130
                                                   112
0.67741935483871 136
                         136
                               134
                                      130
                                            128
                                                   112
                                      130
0.709677419354839 136
                         135
                               133
                                            127
                                                   112
0.741935483870968 134
                         133
                               132
                                      128
                                            125
                                                   110
0.774193548387097 130
                         129
                               127
                                      124
                                            122
                                                   107
0.806451612903226 121
                         121
                               119
                                      116
                                            114
                                                   103
0.838709677419355 121
                         120
                               119
                                                   97.89
                                      116
                                            114
0.870967741935484 119
                         119
                                117
                                      115
                                            113
                                                   96.07
0.903225806451613 116
                         116
                                114
                                      111
                                            108
                                                   83.36
0.935483870967742 98.72 98.31 97.34 94.72 92.56 55.2
0.967741935483871 57.05 56.76 55.65 53.39 51.54 16.45
      229.3 228.4 225.4 218.6 214.7 181.3
```

1972 143

1973 250

Inputs generated by pe5.pl - November 2006

Average of yearly averages: 123.365666666667

```
Data used for this run:
Output File: PAturf6u
Metfile: w14751.dvf
PRZM scenario:
                PAturfSTD.txt
EXAMS environment file: ir298.exv
                Myclobutanil
Chemical Name:
Description Variable Name
                            Value Units Comments
Molecular weight mwt
                      288.8 g/mol
Henry's Law Const.
                      henry 2.6e-8
                                        atm-m<sup>3</sup>/mol
Vapor Pressure vapr 9.75e-6 torr
Solubility sol
               142
                      mg/L
           5.03 mg/L
Kd
     Kd
Koc
     Koc
                 mg/L
Photolysis half-life
                      kdp
                            0
                                  days Half-life
                                             days Halfife
Aerobic Aquatic Metabolism
                            kbacw 1283.48
Anaerobic Aquatic Metabolism kbacs 0 days Halfife
Aerobic Soil Metabolism asm
                            251
                                 days Halfife
                      days Half-life
Hydrolysis: pH 7 0
Method:
           CAM
                 2
                       integer
                                  See PRZM manual
Incorporation Depth:
                      DEPI 4
Application Rate: TAPP 1.456 kg/ha
Application Efficiency: APPEFF
                                  0.95 fraction
Spray Drift DRFT 0.16 fraction of application rate applied to pond
Application Date Date 15-8 dd/mm or dd/mmm or dd-mmm
                      14
                            days Set to 0 or delete line for single app.
Interval 1 interval
                      1.456 kg/ha
app. rate 1 apprate
                            days Set to 0 or delete line for single app.
Interval 2 interval
                      14
app. rate 2 apprate
                      1.456 kg/ha
Interval 3 interval
                      14
                            days Set to 0 or delete line for single app.
app. rate 3 apprate
                      1.456 kg/ha
Interval 4 interval
                      14
                            days Set to 0 or delete line for single app.
app. rate 4 apprate
                      1.456 kg/ha
Interval 5 interval
                     14
                            days Set to 0 or delete line for single app.
app. rate 5 apprate
                      1.456 kg/ha
Record 17: FILTRA
     IPSCND
     UPTKF
Record 18: PLVKRT
     PLDKRT
     FEXTRC
                0.5
Flag for Index Res. Run IR Reservoir
Flag for runoff calc. RUNOFF
                               total none, monthly or total (average of
entire run)
```